

Wales Natural Environment Framework Consultation

Sustainable Development Commission
Feedback Response

21 December 2010

The Sustainable Development Commission, in its role as independent advisor to government on sustainable development, has a long track record of work in relation to the Natural Environment across the UK Government and Devolved Administrations. This consultation response seeks to build upon that work to date, and relates it to the position in Wales.

We support this work to strengthen the arrangements supporting the Natural Environment, as an essential part of achieving sustainable development.

1. Comments on the rationale for development a new Natural Environment Framework

The Sustainable Development Commission welcomes the admission in the consultation document [Welsh Assembly Government, 2010a, p.1-2] that, in spite of the many successes to date, a fully joined up view of the natural environment is not available to aid policy making or individual decisions, and that this limitation is hampering effective sustainable development. We do not suggest that this combined picture can be created and understood easily, however every step towards it is an important one, and we fully support the aims of this consultation.

Developing a Natural Environment Framework is the essential starting point for understanding how all other policies impact on the environment, and to begin to improve the picture portrayed by the Sustainable Development Indicators [Welsh Assembly Government, 2010b].

2. The Strategic Level

A Natural Environment Framework creates the conditions by which practitioners in other fields, who do not have a detailed understanding, training or experience in the natural environment, are able to assess the impacts of their actions and decisions on the environment around them, or to have a clearer understanding of when they need specialist advice or support to develop those assessments. This is an important benefit of developing such a framework, which the Sustainable Development Commission values highly, but it leads to a concern that the areas of work identified in the consultation document [Welsh

Assembly Government, 2010a] do not identify a strategic level above the workstreams to actively engage those outside the traditional communities of practice around the natural environment.

We strongly believe that the key to successfully embedding the Natural Environment Framework into mainstream thinking in Wales is to drive its adoption at a strategic level in all organisations, as a core part of making Sustainable Development the central organising principle of those organisations.

The Natural Environment Framework also has clear links into all policy areas of the Welsh Assembly Government, and in order to function effectively it must be strategically joined up with other key policies and ministerial portfolios. There is some evidence of this already, with links to the Rural Affairs portfolio and the Economic Renewal policy. However the Sustainable Development Commission believes that to overcome the difficulties in embedding environmental policies to date, these links need to be ruthlessly established and exploited across all parts of government.

We would urge the Welsh Assembly Government to identify a 'natural environment champion' either at ministerial level or a senior official level within the government, who should be able to maintain a strategic view of the actions taken in delivering the Natural Environment Framework, and relate them to the wider work of the Welsh Assembly Government, and key indicator metrics such as Wales' global ecological footprint. Without this view, we are concerned that the potential of the Natural Environment Framework will not be fully realised, as pockets of good practice will remain disjointed.

3. Comments on *Building the Evidence Base*

Knowledge and understanding of the natural environment are continually evolving, as new research becomes available and new ideas are tested. The responsible use of sound science is also a central pillar to achieving Sustainable Development as defined by HM Government [2005]. The Sustainable Development Commission therefore strongly supports the work to build a strong base of evidence and knowledge, which is critical to the success of this policy. We would recommend that this is treated as an iterative, evolutionary process by the Welsh Assembly Government, and not a one off exercise. We feel that an important role for the Welsh Assembly Government, and one which the proposed new sustainable development body in Wales could actively support, is to create space for robust discussion and debate around research and emerging ideas in the field with support from ministers.

Within the definition of Sustainable Development, of critical importance to the natural environment is the concept of environmental limits, and the Natural Environment Framework should ensure that all current and future development works take place within environmental limits.

In our recent work, the Commission has suggested a working definition of environmental limits, and we suggest that this is adopted as a central principle of the Natural Environment Framework as a clear definition, and one that is consistent across the UK:

The critical point(s) at which pressure on a natural resource or system creates unacceptable or irreversible change to the resource or system itself, and to the detriment of the [humans and] organisms to which it provides a service [Sustainable Development Commission, 2010a, p.4]

It is also vitally important that environmental limits are applied strictly across a wide definition of the natural environment, to ensure that avoidance mechanisms are not used to push forward damaging development. Our work on defining environmental limits also sought to identify a range of parameters that, as a minimum, should have limits applied to them:

- Levels of carbon dioxide and other greenhouse gases — moving beyond atmospheric concentrations to measure and set limits in relation to carbon flows to and from soils, vegetation and the marine ecosystem
- Biodiversity and habitat quality, quantity and connectivity — this is essential to avoid both species loss and meet EU and international targets, as well as to maintain crucial ecosystem services provided by high quality, well-connected habitats. It will require further work to define favourable conservation status and coherent networks, as highlighted in our Equal Value Investigation and in the Lawton Review
- Air quality — to meet EU limit values and reduce illness and deaths due to respiratory illness
- The quantity, quality, distribution and ecological status of freshwater resources and the status of groundwater (an issue of concern in the Defra report on SD indicators)
- The status of soils and the rate of depletion/degradation --- in order to sustain the productivity of land, prevent the polluting effects of erosion and run-off, and sustain crucial carbon sequestration benefits
- Background concentrations of bioaccumulative, persistent and mobile synthetic chemicals in our air, water and soil
- Land use allocation — to ensure that the multifunctionality of land is supported. This should include the provision of space for biodiversity, carbon sequestration, economic development, food production, green space and recreation, housing and infrastructure, and transportation. It should also consider the conversion of land from ecologically reversible use (such as organic farming) to relatively irreversible use (such as urban development).

We recommend that as a minimum a similar set of criteria are adopted in Wales to give clear guidance on what environmental limits need to be enforced. Just as stringent legislation on the environmental limits for carbon emissions have been enacted, the Sustainable Development Commission would support each other parameter being enforced just as strictly.

This could require further legislation, however we would caution against making an overly complex and bureaucratic system through too much legislation. An opportunity exists to establish a clear regulatory system that embeds environmental limits in all aspects of development, which is essential for a sustainable future.

In supporting the development of a valuable and robust evidence base, the Sustainable Development Commission would draw attention to the following work:

- *Improving Young People's Lives: The role of the environment in building resilience, responsibility and employment chances* [Sustainable Development Commission, 2010b]
- *Health, Place and Nature* [Sustainable Development Commission, 2008]

We would also seek to remind all those involved to recognise that we do not yet fully understand, or have the capability to see, measure or value the full set of ecosystem services and processes around us, and that work to enhance our understanding is extremely valuable to this framework.

4. Comments on *Valuing Ecosystems*

Gaining a proper understanding of the real value of the environment around us, and the ecosystem services we rely on to survive, is an integral part of sustainable development. The Sustainable Development Commission's work in this area covers two main areas:

- The absolute value of the environment, relating to how it is treated and valued in economic terms in traditional project cost-benefit analysis
- The relative values of different ecosystems and species, considered as part of the Equal Value Investigation into the Severn Tidal Power project, which clearly demonstrated that our capabilities to effectively compare habitats from a sustainable development perspective are not yet sufficiently matured and robust.

In both cases, the Sustainable Development Commission sees it as absolutely critical that science leads the economics of this work, and that values attached to our environment through this work are not seen as costs that need to be paid in order for unsustainable developments to proceed. We cannot allow market failures, or misapplication of environmental valuation principles, to be used to further damage our environment.

Building on the work of TEEB, and the recent Government Economic Service work, we would urge the Welsh Assembly Government to define a clear framework or project approach for valuing ecosystems, which is widely applicable to public and other sectors across Wales, and to build this framework into the project approval methodology and gateway processes used. Our suggestion is that ecosystem valuation fits tightly with the *Creating Sustainable Places* approach to projects. As this tool is already in wide use across both the Welsh Assembly Government and wider organisations, this could be a good means to deliver valuation work into the mainstream. Where work at a UK level to better embed sustainability into government decision making tools has slowed [Sustainable Development Commission, 2010c], Wales has an opportunity through unique policy tools such as *Creating Sustainable Places* to firmly embed this approach to project appraisal.

The Sustainable Development Commission's work on Equal Value should also form a key part of the understanding of the valuation principles underlying this framework. The investigation sought, in the context of the proposal to develop a tidal barrage across the Severn estuary, to compare the values of different ecosystems in order to inform the project appraisal. We would urge the Welsh Assembly Government to use this research to help develop the evidence around valuation, and inform the debate on whether ecosystem damage can actually be compensated:

- *Equal Value: Can a major Severn Tidal Power scheme be compatible with enhancing the Natura 2000 Biodiversity Network?* [Sustainable Development Commission, 2010d]
- *Severn Tidal Power Equal Value Investigation* [Trewick Environmental Consultants, 2010]

5. Comments on *Regulatory and Management Approaches, Partnership Mechanisms, and Institutional Arrangements*

The organisational arrangements around delivery of the Natural Environment Framework are critical to its successful adoption into the future. We suggest that several underlying principles are considered when shaping final arrangements:

- To ensure that the delivery bodies and organisations involved are sufficiently resourced and staffed with subject matter experts, to enable clear and rational decision making on the difficult questions put to them.
- To build strong links between the policy and delivery bodies that are enacting legislation and seeking to enforce it, and ensure that these organisations are well connected to the academics and researchers who are bringing forward the latest evidence and new ideas.
- To keep any legislation and policy fleet of foot so that sustainable development principles are applied, rather than reactive legislation made when problems arise.
- To work with practitioners in development and regeneration disciplines to ensure that all professions are engaged with and clearly understand the need for regulation that is brought forward.
- To identify and build on the expertise available at a local/spatial level where deep understanding of environmental issues is available, and leverage that knowledge into policy and decision making.

The effectiveness of this policy should be measurable over the longer term by a recognisable change in the Sustainable Development Indicators in relation to biodiversity and the environment. Work to improve the quality of the existing indicators, define new indicators, and to better collect timely and accurate data could effectively bring the policy and delivery organisations together. This would ensure that all organisations have a useful role in regularly collecting, analysing and questioning the data behind the indicators, and to ensure that the Natural Environment Framework policy is taking us in the right direction.

The Sustainable Development Commission commends this policy development, and are keen to see a renewed level of interest in, and protection of, our natural environment in

Wales. The urgency of action needed to halt biodiversity loss and environmental damage is such that little time is available.

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